

Jun 27, 2019

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. **19-60188-CR-SMITH/VALLE**

18 U.S.C. § 1349

18 U.S.C. § 1343

18 U.S.C. § 981(a)(1)(C)

UNITED STATES OF AMERICA

vs.

SHIRAAZ SOOKRALLI,

Defendant.

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

1. Company A was a Florida corporation based in Broward County, Florida. Company A was in the business of, among other things, selling and servicing Porsche vehicles.

2. Company B, an affiliate of Company A was a Florida corporation based in Broward County, Florida. Company B was in the business of, among other things, providing after-market parts and enhancements to Porsche vehicles.

3. Defendant **SHIRAAZ SOOKRALLI** was a resident of Broward County, Florida. From approximately September 2009 to approximately September 2018, Company A and Company B employed **SOOKRALLI** in various capacities including in the sale and marketing of Porsche vehicles to prospective customers.

COUNT 1
Conspiracy to Commit Mail and Wire Fraud
(18 U.S.C. § 1349)

1. The General Allegations section of this Indictment is re-alleged and incorporated by reference as though fully set forth herein.

2. From in or around March 2017, through in or around September 2018, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

SHIRAAZ SOOKRALLI,

did willfully, that is, with the intent to further the objects of the conspiracy, and knowingly combine, conspire, confederate, and agree with others known and unknown to the Grand Jury, namely:

(a) to knowingly, and with the intent to defraud, devise, and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made, and for the purpose of executing such scheme and artifice to defraud, did knowingly cause to be delivered certain mail matter by the United States Postal Service and by private and commercial interstate carrier, according to the directions thereon, in violation of Title 18, United States Code, Section 1341; and

(b) to knowingly, and with the intent to defraud, devise, and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made, and for the purpose of executing such scheme and artifice to defraud, did knowingly transmit and cause to be transmitted, by means of wire communication, in interstate and foreign commerce, certain writings, signs, signals, pictures, and

sounds, in violation of Title 18, United States Code, Section 1343.

PURPOSE OF THE CONSPIRACY

3. It was a purpose of the conspiracy for the defendant and his co-conspirators to unlawfully enrich themselves by causing individuals and corporations to pay advance deposits for Porsche vehicles based on materially false and fraudulent representations, and then misappropriating those funds for the defendant's and his co-conspirators' personal use.

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendant and his co-conspirators sought to accomplish the objects and purpose of the conspiracy included, among others, the following:

4. Starting in or around March 2017, **SHIRAAZ SOOKRALLI**, under the guise of his employment with Company A and Company B, entered into false and fraudulent sales agreements with customers located throughout the United States for the unauthorized sale of Porsche automobiles. To purportedly consummate these sales, **SOOKRALLI** required and accepted cash deposits, wire transfers, and bank checks from the customers that **SOOKRALLI** later deposited into a bank account he controlled in the name of Champion Autosport. At no time did any legitimate representative of Company A or Company B authorize **SOOKRALLI** to conduct these transactions.

5. **SHIRAAZ SOOKRALLI** typically provided the customers with signed false and fraudulent purchase orders on official Company A forms, sham vehicle build sheets showing the specifications of the customers' vehicle, as well as other false and fraudulent documents, such as signed correspondence on Company A letterhead memorializing customers' vehicle purchases.

6. **SHIRAAZ SOOKRALLI** often communicated with customers using email and other wire communications. Some customers sent **SOOKRALLI** payments using the United

States mails and interstate bank wire transfers.

7. **SHIRAAZ SOOKRALLI** made numerous materially false and fraudulent statements to customers, both orally and in writing.

8. Between May 2017 and July 2018, customers wired or otherwise transferred approximately \$3,000,000 to **SHIRAAZ SOOKRALLI**, which he used for his and his co-conspirators' personal use and benefit.

All in violation of Title 18, United States Code, Section 1349.

COUNTS 2-4
Wire Fraud
(18 U.S.C. § 1343)

1. The General Allegations section of this Indictment is re-alleged and incorporated by reference as though fully set forth herein.

2. From in or around March 2017, through in or around September 2018, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

SHIRAAZ SOOKRALLI,

did knowingly, and with the intent to defraud, devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made, and for the purpose of executing such scheme and artifice to defraud, did knowingly transmit and cause to be transmitted, by means of wire communication, in interstate and foreign commerce, certain writings, signs, signals, pictures and sounds, in violation of Title 18, United States Code, Section 1343.

PURPOSE OF THE SCHEME AND ARTIFICE

3. It was a purpose of the scheme and artifice for the defendant and his accomplices to unlawfully enrich themselves by causing individuals and corporations to pay advance deposits for Porsche vehicles based on materially false and fraudulent representations, and then misappropriating those funds for the defendant's and his accomplices' personal use.

THE SCHEME AND ARTIFICE

4. Paragraphs 4 through 8 of the Manner and Means section of Count 1 are re-alleged and incorporated by reference as a description of the scheme and artifice.

USE OF THE WIRES

5. On or about the dates enumerated as to each count below, the defendant, for the purpose of executing and in furtherance of the scheme and artifice to defraud and to obtain money and property by means of materially and false and fraudulent pretenses, representations, and promises, knowing the pretenses, representations, and promises were false and fraudulent when made, did knowingly transmit and cause to be transmitted by wire communication in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, as more particularly described below:

COUNT	APPROXIMATE DATE OF WIRING	DESCRIPTION OF WIRE COMMUNICATION
2	May 15, 2017	Customer M.K. wired \$125,000 from his UBS Financial Services Inc. bank account in Michigan to a Champion Autosport Bank of America account in Broward County, Florida
3	July 28, 2017	Customer C.C. wired \$130,000 from his Chase Bank account in California to a Champion Autosport Bank of America account in Broward County, Florida
4	September 15, 2017	Customer R.A. wired \$15,000 from a JP Morgan Chase Bank NA bank account in New York to a Champion Autosport Bank of America account in Broward County, Florida

In violation of Title 18, United States Code, Sections 1343 and 2.

FORFEITURE
(18 U.S.C. § 981(a)(1)(C))

1. The allegations of this Indictment are by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of certain property in which the defendant has an interest.

2. Upon conviction of any of the offenses alleged in Counts 1 through 4 of this Indictment, the defendant, **SHIRAAZ SOOKRALLI**, shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to such violations.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), and the procedures set forth at Title 21, United States Code, Section 853.

A TRUE BILL

FOREPERSON



ARIANA FAJARDO ORSHAN
UNITED STATES ATTORNEY



ROGER CRUZ
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO. _____

v.

CERTIFICATE OF TRIAL ATTORNEY*

SHIRAAZ SOOKRALLI,

Defendant.

Superseding Case Information:

Court Division: (Select One)

<input checked="" type="checkbox"/>	Miami	<input type="checkbox"/>	Key West	<input type="checkbox"/>	FTP
<input checked="" type="checkbox"/>	FTL	<input type="checkbox"/>	WPB	<input type="checkbox"/>	

New defendant(s)	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Number of new defendants		<input type="checkbox"/>		<input type="checkbox"/>
Total number of counts		<input type="checkbox"/>		<input type="checkbox"/>

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.
3. Interpreter: (Yes or No) No
List language and/or dialect _____
4. This case will take 6 days for the parties to try.
5. Please check appropriate category and type of offense listed below:

(Check only one)

- | | | |
|-----|------------------|-------------------------------------|
| I | 0 to 5 days | <input type="checkbox"/> |
| II | 6 to 10 days | <input checked="" type="checkbox"/> |
| III | 11 to 20 days | <input type="checkbox"/> |
| IV | 21 to 60 days | <input type="checkbox"/> |
| V | 61 days and over | <input type="checkbox"/> |

(Check only one)

- | | |
|---------|-------------------------------------|
| Petty | <input type="checkbox"/> |
| Minor | <input type="checkbox"/> |
| Misdem. | <input type="checkbox"/> |
| Felony | <input checked="" type="checkbox"/> |

6. Has this case previously been filed in this District Court? (Yes or No) No
If yes: Judge _____ Case No. _____
(Attach copy of dispositive order)

Has a complaint been filed in this matter?

(Yes or No) Yes

If yes: Magistrate Case No. _____

19-MJ-6076-HUNT

Related miscellaneous numbers: _____

Defendant(s) in federal custody as of _____

Defendant(s) in state custody as of _____

Rule 20 from the District of _____

Is this a potential death penalty case? (Yes or No) No

7. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to August 9, 2013 (Mag. Judge Alicia O. Valle)? Yes ☐ No ☒
8. Does this case originate from a matter pending in the Northern Region U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? Yes ☐ No ☒


 ROGER CRUIKSHANK
 ASSISTANT UNITED STATES ATTORNEY
 Florida Bar No.: 157971

*Penalty Sheet(s) attached

REV 8/13/2018

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: SHIRAAZ SOOKRALLI

Case No: _____

Count # 1:

Conspiracy to Commit Mail and Wire Fraud

Title 18, United States Code, Section 1349

***Max. Penalty:** Twenty (20) Years' Imprisonment

Counts # 2-4:

Wire Fraud

Title 18, United States Code, Section 1343

***Max. Penalty:** Twenty (20) Years' Imprisonment as to Each Count

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**